

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION

JUSTIN WILLIAMS AND REBEKAH §  
WILLIAMS, A/N/F M.L.W., §  
§  
§  
*Petitioners.* §

**APPENDIX TO NOTICE OF REMOVAL**

No.	Document	State Court Filing Date
1	Executed Citations	03/02/2023-03/08/2023
2	Petitioner's Verified Petition to Take Depositions to Investigate a Potential Claim or Suit	11/10/2023
3	Orders and Notices ~Notice of Court Proceeding	02/27/2023
4	Docket Sheet	03/21/2023

## EXECUTED CITATIONS

096-338395-22

FILED  
TARRANT COUNTY  
3/3/2023 4:10 PM  
THOMAS A. WILDER  
DISTRICT CLERK

**CAUSE NO. 096-338395-22**

**JUSTIN WILLIAMS and REBEKAH  
WILLIAMS, A/N/F M.I.W.,**

**Petitioners,**

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**IN THE DISTRICT COURT**

**96TH JUDICIAL DISTRICT**

**TARRANT COUNTY, TEXAS**

**RETURN OF SERVICE**

Came to my hand on **Tuesday, February 28, 2023 at 8:00 PM,**  
Executed at: **3900 SW GREEN OAKS BOULEVARD, ARLINGTON, TX 76017**  
at **10:35 AM, on Thursday, March 2, 2023,** by individually and personally  
delivering to the within named:

**CARL LEWIS**

a true copy of this

**CITATION and PETITIONERS' VERIFIED PETITION TO TAKE DEPOSITIONS TO TAKE  
DEPOSITIONS TO INVESTIGATE A POTENTIAL CLAIM OR SUIT with  
EXHIBIT A and NOTICE OF COURT PROCEEDING**

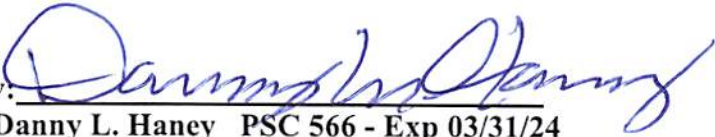
having first endorsed thereon the date of the delivery.

I am a person not less than eighteen (18) years of age and I am competent to make this oath. I am a resident of the State of Texas. I have personal knowledge of the facts and statements contained herein and aver that each is true and correct. I am not a party to nor related or affiliated with any party to this suit. I have no interest in the outcome of the suit. I have never been convicted of a felony or of a misdemeanor involving moral turpitude. I am familiar with the Texas Rules of Civil Procedure, and the Texas Civil Practice and Remedies Codes as they apply to service of process. I am certified by the Judicial Branch Certification Commission to deliver citations and other notices from any District, County and Justice Courts in and for the State of Texas in compliance with rule 103 and 501.2 of the TRCP."

My name is Danny L. Haney, my date of birth is March 27, 1958 and my address is 5470 L.B.J. Freeway, Dallas, Texas, 75240 in the county of Dallas, United States of America. I declare under penalty of perjury that the foregoing is true and correct.

Executed in Dallas County, State of Texas, on Friday, March 3, 2023

By:

  
**Danny L. Haney PSC 566 - Exp 03/31/24**  
**served@specialdelivery.com**

**EXHIBIT**

**1**

THE STATE OF TEXAS  
DISTRICT COURT, TARRANT COUNTY

CITATION

Cause No. 096-338395-22

JUSTIN WILLIAMS, ET AL  
VS.

TO: CARL LEWIS

3900 SW GREEN OAKS BLVD ARLINGTON, TX 76017-

You said DEFENDANTS are hereby commanded to appear by filing a written answer to the PETITIONER'S VERIFIED PETITION TO TAKE DEPOSITIONS INVESTIGATE A POTENTIAL CLAIM OR SUIT at or before 10 o'clock A.M. of the Monday next after the expiration of 20 days after the date of service hereof before the 96th District Court, 100 N CALHOUN, in and for Tarrant County, Texas, at the Courthouse in the City of Fort Worth, Tarrant County, Texas said PLAINTIFFS being

JUSTIN WILLIAMS, REBEKAH WILLIAMS

Filed in said Court on November 10th, 2022 Against  
CODI VAN DUZEE, CARL LEWIS, JULIE ANDERSON, DR GREG CARTWRIGHT, DR MICHAEL HILL

For suit, said suit being numbered 096-338395-22 the nature of which demand is as shown on said PETITIONER'S VERIFIED PETITION TO TAKE DEPOSITIONS INVESTIGATE A POTENTIAL CLAIM OR SUIT a copy of which accompanies this citation.

GEORGE H SHAKE

Attorney for JUSTIN WILLIAMS Phone No. (214)416-9010

Address 4311 OAK LAWN AVE STE 600 DALLAS, TX 75219

Thomas A. Wilder, Clerk of the District Court of Tarrant County, Texas. Given under my hand and the seal of said Court, at office in the City of Fort Worth, this the 2nd day of December, 2022.

By

nykole Taylor  
NYKOLE TAYLOR



A CERTIFIED COPY  
ATTEST: 12/02/2022  
THOMAS A. WILDER  
DISTRICT CLERK  
TARRANT COUNTY, TEXAS  
BY: /s/ Nykole Taylor

NOTICE: You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10:00 AM, on the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org.

Thomas A. Wilder, Tarrant County District Clerk, 100 N CALHOUN, FORT WORTH TX 76196-0402

OFFICER'S RETURN \*09633839522000006\*

Received this Citation on the \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_ at \_\_\_\_\_ o'clock \_\_\_\_\_ M; and executed at \_\_\_\_\_ within the county of \_\_\_\_\_, State of \_\_\_\_\_ at \_\_\_\_\_ o'clock \_\_\_\_\_ M on the \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_ by delivering to the within named (Def.): \_\_\_\_\_ defendant(s), a true copy of this Citation together with the accompanying copy of PETITIONER'S VERIFIED PETITION TO TAKE DEPOSITIONS INVESTIGATE A POTENTIAL CLAIM OR SUIT, having first endorsed on same the date of delivery.

Authorized Person/Constable/Sheriff: \_\_\_\_\_

County of \_\_\_\_\_ State of \_\_\_\_\_ By \_\_\_\_\_ Deputy

Fees \$ \_\_\_\_\_

State of \_\_\_\_\_ County of \_\_\_\_\_ (Must be verified if served outside the State of Texas)

Signed and sworn to by the said \_\_\_\_\_ before me this \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_

to certify which witness my hand and seal of office

(Seal)

County of \_\_\_\_\_, State of \_\_\_\_\_

RETURN / AFFIDAVIT  
PROOF / ATTACHED

RETURN / AFFIDAVIT  
PROOF / ATTACHED

*CITATION*

Cause No. 096-338395-22

JUSTIN WILLIAMS, ET AL

VS.

ISSUED

This 2nd day of December, 2022

Thomas A. Wilder  
Tarrant County District Clerk  
100 N CALHOUN  
FORT WORTH TX 76196-0402

By NYKOLE TAYLOR Deputy

GEORGE H SHAKE  
Attorney for: JUSTIN WILLIAMS  
Phone No. (214)416-9010  
ADDRESS: 4311 OAK LAWN AVE STE 600

DALLAS, TX 75219

*CIVIL LAW*



\*0963383952200006\*

SERVICE FEES NOT COLLECTED  
BY TARRANT COUNTY DISTRICT CLERK  
ORIGINAL



A CERTIFIED COPY  
ATTEST: 12/02/2022  
THOMAS A. WILDER  
DISTRICT CLERK  
TARRANT COUNTY, TEXAS  
BY: /s/ Nykole Taylor



096-338395-22

FILED  
TARRANT COUNTY  
3/3/2023 4:11 PM  
THOMAS A. WILDER  
DISTRICT CLERK

**CAUSE NO. 096-338395-22**

**JUSTIN WILLIAMS and REBEKAH  
WILLIAMS, A/N/F M.I.W.,**

**Petitioners,**

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**IN THE DISTRICT COURT**

**96TH JUDICIAL DISTRICT**

**TARRANT COUNTY, TEXAS**

**RETURN OF SERVICE**

Came to my hand on **Tuesday, February 28, 2023 at 8:00 PM,**  
Executed at: **3900 SW GREEN OAKS BOULEVARD, ARLINGTON, TX 76017**  
at **10:45 AM, on Thursday, March 2, 2023,** by individually and personally  
delivering to the within named:

**JULIE ANDERSON**

a true copy of this

**CITATION and PETITIONERS' VERIFIED PETITION TO TAKE DEPOSITIONS TO TAKE  
DEPOSITIONS TO INVESTIGATE A POTENTIAL CLAIM OR SUIT with  
EXHIBIT A and NOTICE OF COURT PROCEEDING**

having first endorsed thereon the date of the delivery.

I am a person not less than eighteen (18) years of age and I am competent to make this oath. I am a resident of the State of Texas. I have personal knowledge of the facts and statements contained herein and aver that each is true and correct. I am not a party to nor related or affiliated with any party to this suit. I have no interest in the outcome of the suit. I have never been convicted of a felony or of a misdemeanor involving moral turpitude. I am familiar with the Texas Rules of Civil Procedure, and the Texas Civil Practice and Remedies Codes as they apply to service of process. I am certified by the Judicial Branch Certification Commission to deliver citations and other notices from any District, County and Justice Courts in and for the State of Texas in compliance with rule 103 and 501.2 of the TRCP."

My name is Danny L. Haney, my date of birth is March 27, 1958 and my address is 5470 L.B.J. Freeway, Dallas, Texas, 75240 in the county of Dallas, United States of America. I declare under penalty of perjury that the foregoing is true and correct.

Executed in Dallas County, State of Texas, on Friday, March 3, 2023

By:   
Danny L. Haney PSC 566 - Exp 03/31/24  
served@specialdelivery.com

THE STATE OF TEXAS  
DISTRICT COURT, TARRANT COUNTY

CITATION

Cause No. 096-338395-22

JUSTIN WILLIAMS, ET AL  
VS.

TO: JULIE ANDERSON

3900 SW GREEN OAKS BLVD ARLINGTON, TX 76017-

You said DEFENDANTS are hereby commanded to appear by filing a written answer to the PETITIONER'S VERIFIED PETITION TO TAKE DEPOSITIONS INVESTIGATE A POTENTIAL CLAIM OR SUIT at or before 10 o'clock A.M. of the Monday next after the expiration of 20 days after the date of service hereof before the 96th District Court, 100 N CALHOUN, in and for Tarrant County, Texas, at the Courthouse in the City of Fort Worth, Tarrant County, Texas said PLAINTIFFS being

JUSTIN WILLIAMS, REBEKAH WILLIAMS

Filed in said Court on November 10th, 2022 Against  
CODI VAN DUZEE, CARL LEWIS, JULIE ANDERSON, DR GREG CARTWRIGHT, DR MICHAEL HILL

For suit, said suit being numbered 096-338395-22 the nature of which demand is as shown on said PETITIONER'S VERIFIED PETITION TO TAKE DEPOSITIONS INVESTIGATE A POTENTIAL CLAIM OR SUIT a copy of which accompanies this citation.

GEORGE H SHAKE

Attorney for JUSTIN WILLIAMS Phone No. (214)416-9010  
Address 4311 OAK LAWN AVE STE 600 DALLAS, TX 75219

Thomas A. Wilder, Clerk of the District Court of Tarrant County, Texas. Given under my hand and the seal of said Court, at office in the City of Fort Worth, this the 2nd day of December, 2022.

By NyKole Taylor  
NYKOLE TAYLOR



A CERTIFIED COPY  
ATTEST: 12/02/2022  
THOMAS A. WILDER  
DISTRICT CLERK  
TARRANT COUNTY, TEXAS  
BY: /s/ NyKole Taylor

NOTICE: You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10:00 AM, on the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org.

Thomas A. Wilder, Tarrant County District Clerk, 100 N CALHOUN, FORT WORTH TX 76196-0402

OFFICER'S RETURN \*09633839522000007\*

Received this Citation on the \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_ at \_\_\_\_\_ o'clock \_\_\_\_\_ M; and executed at \_\_\_\_\_ within the county of \_\_\_\_\_, State of \_\_\_\_\_ at \_\_\_\_\_ o'clock \_\_\_\_\_ M on the \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_ by delivering to the within named (Def.): \_\_\_\_\_ defendant(s), a true copy of this Citation together with the accompanying copy of PETITIONER'S VERIFIED PETITION TO TAKE DEPOSITIONS INVESTIGATE A POTENTIAL CLAIM OR SUIT, having first endorsed on same the date of delivery.

Authorized Person/Constable/Sheriff: \_\_\_\_\_

County of \_\_\_\_\_ State of \_\_\_\_\_ By \_\_\_\_\_ Deputy

Fees \$ \_\_\_\_\_

State of \_\_\_\_\_ County of \_\_\_\_\_ (Must be verified if served outside the State of Texas)

Signed and sworn to by the said \_\_\_\_\_ before me this \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_

to certify which witness my hand and seal of office

(Seal)

County of \_\_\_\_\_, State of \_\_\_\_\_

RETURN / AFFIDAVIT  
PROOF / ATTACHED

RETURN / AFFIDAVIT  
PROOF / ATTACHED

**CITATION**

Cause No. 096-338395-22

JUSTIN WILLIAMS, ET AL

VS.

**ISSUED**

This 2nd day of December, 2022

Thomas A. Wilder  
Tarrant County District Clerk  
100 N CALHOUN  
FORT WORTH TX 76196-0402

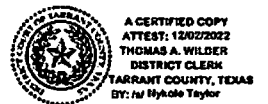
By NYKOLE TAYLOR Deputy

GEORGE H SHAKE  
Attorney for: JUSTIN WILLIAMS  
Phone No. (214)416-9010  
ADDRESS: 4311 OAK LAWN AVE STE 600

DALLAS, TX 75219

**CIVIL LAW**

\*09633839522000007\*  
SERVICE FEES NOT COLLECTED  
BY TARRANT COUNTY DISTRICT CLERK  
ORIGINAL





096-338395-22

FILED  
TARRANT COUNTY  
3/3/2023 4:11 PM  
THOMAS A. WILDER  
DISTRICT CLERK

**CAUSE NO. 096-338395-22**

**JUSTIN WILLIAMS and REBEKAH  
WILLIAMS, A/N/F M.I.W.,**

**Petitioners,**

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**IN THE DISTRICT COURT**

**96TH JUDICIAL DISTRICT**

**TARRANT COUNTY, TEXAS**

**RETURN OF SERVICE**

Came to my hand on **Tuesday, February 28, 2023 at 8:00 PM,**  
Executed at: **3900 SW GREEN OAKS BOULEVARD, ARLINGTON, TX 76017**  
at **10:40 AM, on Thursday, March 2, 2023,** by individually and personally  
delivering to the within named:

**CODI VAN DUZEE**

a true copy of this

**CITATION and PETITIONERS' VERIFIED PETITION TO TAKE DEPOSITIONS TO TAKE  
DEPOSITIONS TO INVESTIGATE A POTENTIAL CLAIM OR SUIT with  
EXHIBIT A and NOTICE OF COURT PROCEEDING**

having first endorsed thereon the date of the delivery.

I am a person not less than eighteen (18) years of age and I am competent to make this oath. I am a resident of the State of Texas. I have personal knowledge of the facts and statements contained herein and aver that each is true and correct. I am not a party to nor related or affiliated with any party to this suit. I have no interest in the outcome of the suit. I have never been convicted of a felony or of a misdemeanor involving moral turpitude. I am familiar with the Texas Rules of Civil Procedure, and the Texas Civil Practice and Remedies Codes as they apply to service of process. I am certified by the Judicial Branch Certification Commission to deliver citations and other notices from any District, County and Justice Courts in and for the State of Texas in compliance with rule 103 and 501.2 of the TRCP."

My name is Danny L. Haney, my date of birth is March 27, 1958 and my address is 5470 L.B.J. Freeway, Dallas, Texas, 75240 in the county of Dallas, United States of America. I declare under penalty of perjury that the foregoing is true and correct.

Executed in Dallas County, State of Texas, on Friday, March 3, 2023

By:   
**Danny L. Haney PSC 566 - Exp 03/31/24**  
**served@specialdelivery.com**

THE STATE OF TEXAS  
DISTRICT COURT, TARRANT COUNTY

CITATION

Cause No. 096-338395-22

JUSTIN WILLIAMS, ET AL  
VS.

TO: CODI VAN DUZEE

3900 SW GREEN OAKS BLVD ARLINGTON, TX 76017-

You said DEFENDANTS are hereby commanded to appear by filing a written answer to the PETITIONER'S VERIFIED PETITION TO TAKE DEPOSITIONS INVESTIGATE A POTENTIAL CLAIM OR SUIT at or before 10 o'clock A.M. of the Monday next after the expiration of 20 days after the date of service hereof before the 96th District Court, 100 N CALHOUN, in and for Tarrant County, Texas, at the Courthouse in the City of Fort Worth, Tarrant County, Texas said PLAINTIFFS being

JUSTIN WILLIAMS, REBEKAH WILLIAMS

Filed in said Court on November 10th, 2022 Against  
CODI VAN DUZEE, CARL LEWIS, JULIE ANDERSON, DR GREG CARTWRIGHT, DR MICHAEL HILL

For suit, said suit being numbered 096-338395-22 the nature of which demand is as shown on said PETITIONER'S VERIFIED PETITION TO TAKE DEPOSITIONS INVESTIGATE A POTENTIAL CLAIM OR SUIT a copy of which accompanies this citation.

GEORGE H SHAKE

Attorney for JUSTIN WILLIAMS Phone No. (214)416-9010

Address 4311 OAK LAWN AVE STE 600 DALLAS, TX 75219

Thomas A. Wilder, Clerk of the District Court of Tarrant County, Texas. Given under my hand and the seal of said Court, at office in the City of Fort Worth, this the 2nd day of December, 2022.

By NyKole Taylor  
NYKOLE TAYLOR



NOTICE: You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10:00 AM. on the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org.

Thomas A. Wilder, Tarrant County District Clerk, 100 N CALHOUN, FORT WORTH TX 76196-0402

OFFICER'S RETURN \*09633839522000005\*

Received this Citation on the \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_ at \_\_\_\_\_ o'clock \_\_\_\_\_ M; and executed at \_\_\_\_\_ within the county of \_\_\_\_\_, State of \_\_\_\_\_ at \_\_\_\_\_ o'clock \_\_\_\_\_ M on the \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_ by delivering to the within named (Def.): \_\_\_\_\_ defendant(s), a true copy of this Citation together with the accompanying copy of PETITIONER'S VERIFIED PETITION TO TAKE DEPOSITIONS INVESTIGATE A POTENTIAL CLAIM OR SUIT, having first endorsed on same the date of delivery.

Authorized Person/Constable/Sheriff: \_\_\_\_\_

County of \_\_\_\_\_ State of \_\_\_\_\_ By \_\_\_\_\_ Deputy

Fees \$ \_\_\_\_\_

State of \_\_\_\_\_ County of \_\_\_\_\_ (Must be verified if served outside the State of Texas)

Signed and sworn to by the said \_\_\_\_\_ before me this \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_

to certify which witness my hand and seal of office

(Seal)

County of \_\_\_\_\_, State of \_\_\_\_\_

RETURN / AFFIDAVIT  
PROOF / ATTACHED

RETURN / AFFIDAVIT  
PROOF / ATTACHED

**CITATION**

Cause No. 096-338395-22

JUSTIN WILLIAMS, ET AL

VS.

ISSUED

This 2nd day of December, 2022

Thomas A. Wilder  
Tarrant County District Clerk  
100 N CALHOUN  
FORT WORTH TX 76196-0402

By NYKOLE TAYLOR Deputy

GEORGE H SHAKE  
Attorney for: JUSTIN WILLIAMS  
Phone No. (214)416-9010  
ADDRESS: 4311 OAK LAWN AVE STE 600

DALLAS, TX 75219

**CIVIL LAW**



\*09633839522000005\*  
SERVICE FEES NOT COLLECTED  
BY TARRANT COUNTY DISTRICT CLERK  
ORIGINAL



A CERTIFIED COPY  
ATTEST: 12/02/2022  
THOMAS A. WILDER  
DISTRICT CLERK  
TARRANT COUNTY, TEXAS  
BY: /s/ Nykole Taylor



096-338395-22

FILED  
TARRANT COUNTY  
3/3/2023 4:10 PM  
THOMAS A. WILDER  
DISTRICT CLERK

**CAUSE NO. 096-338395-22**

**JUSTIN WILLIAMS and REBEKAH  
WILLIAMS, A/N/F M.I.W.,**

**Petitioners,**

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**IN THE DISTRICT COURT**

**96TH JUDICIAL DISTRICT**

**TARRANT COUNTY, TEXAS**

**RETURN OF SERVICE**

Came to my hand on **Tuesday, February 28, 2023 at 8:00 PM,**  
Executed at: **4501 WEST PLEASANT RIDGE, ARLINGTON, TX 76016**  
at **11:10 AM, on Thursday, March 2, 2023,** by individually and personally  
delivering to the within named:

**DR. GREG CARTWRIGHT**

a true copy of this

**CITATION and PETITIONERS' VERIFIED PETITION TO TAKE DEPOSITIONS TO TAKE  
DEPOSITIONS TO INVESTIGATE A POTENTIAL CLAIM OR SUIT with  
EXHIBIT A and NOTICE OF COURT PROCEEDING**

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Executed in Dallas County, State of Texas, on Friday, March 3, 2023

By: 

**Danny L. Haney PSC 566 - Exp 03/31/24**  
**served@specialdelivery.com**

THE STATE OF TEXAS  
DISTRICT COURT, TARRANT COUNTY

CITATION

Cause No. 096-338395-22

JUSTIN WILLIAMS, ET AL  
VS.

TO: DR GREG CARTWRIGHT

4501 W PLEASANT RIDGE ARLINGTON, TX 76016-

You said DEFENDANTS are hereby commanded to appear by filing a written answer to the PETITIONER'S VERIFIED PETITION TO TAKE DEPOSITIONS INVESTIGATE A POTENTIAL CLAIM OR SUIT at or before 10 o'clock A.M. of the Monday next after the expiration of 20 days after the date of service hereof before the 96th District Court, 100 N CALHOUN, in and for Tarrant County, Texas, at the Courthouse in the City of Fort Worth, Tarrant County, Texas said PLAINTIFFS being

JUSTIN WILLIAMS, REBEKAH WILLIAMS

Filed in said Court on November 10th, 2022 Against  
CODI VAN DUZEE, CARL LEWIS, JULIE ANDERSON, DR GREG CARTWRIGHT, DR MICHAEL HILL

For suit, said suit being numbered 096-338395-22 the nature of which demand is as shown on said PETITIONER'S VERIFIED PETITION TO TAKE DEPOSITIONS INVESTIGATE A POTENTIAL CLAIM OR SUIT a copy of which accompanies this citation.

GEORGE H SHAKE

Attorney for JUSTIN WILLIAMS Phone No. (214)416-9010  
Address 4311 OAK LAWN AVE STE 600 DALLAS, TX 75219

Thomas A. Wilder, Clerk of the District Court of Tarrant County, Texas. Given under my hand and the seal of said Court, at office in the City of Fort Worth, this the 2nd day of December, 2022.

By

*NyKole Taylor*  
NYKOLE TAYLOR



A CERTIFIED COPY  
ATTEST: 12/02/2022  
THOMAS A. WILDER  
DISTRICT CLERK  
TARRANT COUNTY, TEXAS  
BY: /s/ NyKole Taylor

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Thomas A. Wilder, Tarrant County District Clerk, 100 N CALHOUN, FORT WORTH TX 76196-0402

OFFICER'S RETURN \*09633839522000008\*

Received this Citation on the \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_ at \_\_\_\_\_ o'clock \_\_\_\_\_ M; and executed at \_\_\_\_\_ within the county of \_\_\_\_\_, State of \_\_\_\_\_ at \_\_\_\_\_ o'clock \_\_\_\_\_ M on the \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_ by delivering to the within named (Def.): \_\_\_\_\_ defendant(s), a true copy of this Citation together with the accompanying copy of PETITIONER'S VERIFIED PETITION TO TAKE DEPOSITIONS INVESTIGATE A POTENTIAL CLAIM OR SUIT, having first endorsed on same the date of delivery.

Authorized Person/Constable/Sheriff: \_\_\_\_\_

County of \_\_\_\_\_ State of \_\_\_\_\_ By \_\_\_\_\_ Deputy

Fees \$ \_\_\_\_\_

State of \_\_\_\_\_ County of \_\_\_\_\_ (Must be verified if served outside the State of Texas)

Signed and sworn to by the said \_\_\_\_\_ before me this \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_

to certify which witness my hand and seal of office

(Seal)

County of \_\_\_\_\_, State of \_\_\_\_\_

RETURN / AFFIDAVIT  
PROOF / ATTACHED

RETURN / AFFIDAVIT  
PROOF / ATTACHED



*CITATION*

Cause No. 096-338395-22

JUSTIN WILLIAMS, ET AL

VS.

ISSUED

This 2nd day of December, 2022

Thomas A. Wilder  
Tarrant County District Clerk  
100 N CALHOUN  
FORT WORTH TX 76196-0402

By NYKOLE TAYLOR Deputy

GEORGE H SHAKE  
Attorney for: JUSTIN WILLIAMS  
Phone No. (214)416-9010  
ADDRESS: 4311 OAK LAWN AVE STE 600

DALLAS, TX 75219

*CIVIL LAW*

\*09633839522000008\*  
SERVICE FEES NOT COLLECTED  
BY TARRANT COUNTY DISTRICT CLERK  
ORIGINAL



A CERTIFIED COPY  
ATTEST: 12/02/2022  
THOMAS A. WILDER  
DISTRICT CLERK  
TARRANT COUNTY, TEXAS  
DT: /s/ Nykole Taylor

096-338395-22

FILED  
TARRANT COUNTY  
3/8/2023 4:43 PM  
THOMAS A. WILDER  
DISTRICT CLERK

**CAUSE NO. 096-338395-22**

**JUSTIN WILLIAMS and REBEKAH  
WILLIAMS, A/N/F M.L.W.,**

**Petitioners,**

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**IN THE DISTRICT COURT**

**96TH JUDICIAL DISTRICT**

**TARRANT COUNTY, TEXAS**

**RETURN OF SERVICE**

Came to my hand on **Tuesday, February 28, 2023 at 8:00 PM,**  
Executed at: **690 EAST LAMAR BOULEVARD, ARLINGTON, TX 76011**  
at **9:40 AM, on Friday, March 3, 2023,** by individually and personally  
delivering to the within named:

**DR. MICHAEL HILL**

a true copy of this

**CITATION and PETITIONERS' VERIFIED PETITION TO TAKE  
DEPOSITIONS TO TAKE DEPOSITIONS TO INVESTIGATE A POTENTIAL  
CLAIM OR SUIT with EXHIBIT A and NOTICE OF COURT PROCEEDING**

having first endorsed thereon the date of the delivery.

I am a person not less than eighteen (18) years of age and I am competent to make this oath. I am a resident of the State of Texas. I have personal knowledge of the facts and statements contained herein and aver that each is true and correct. I am not a party to nor related or affiliated with any party to this suit. I have no interest in the outcome of the suit. I have never been convicted of a felony or of a misdemeanor involving moral turpitude. I am familiar with the Texas Rules of Civil Procedure, and the Texas Civil Practice and Remedies Codes as they apply to service of process. I am certified by the Judicial Branch Certification Commission to deliver citations and other notices from any District, County and Justice Courts in and for the State of Texas in compliance with rule 103 and 501.2 of the TRCP."

My name is Danny L. Haney, my date of birth is March 27, 1958 and my address is 5470 L.B.J. Freeway, Dallas, Texas, 75240 in the county of Dallas, United States of America. I declare under penalty of perjury that the foregoing is true and correct.

Executed in Dallas County, State of Texas, on Wednesday, March 8, 2023

By:   
Danny L. Haney - PSC 666 - Exp 03/31/24  
served@specialdelivery.com

THE STATE OF TEXAS  
DISTRICT COURT, TARRANT COUNTY

CITATION

Cause No. 096-338395-22

JUSTIN WILLIAMS, ET AL  
VS.

TO: DR MICHAEL HILL

690 E LAMAR BLVD ARLINGTON, TX 76011-

You said DEFENDANTS are hereby commanded to appear by filing a written answer to the PETITIONER'S VERIFIED PETITION TO TAKE DEPOSITIONS INVESTIGATE A POTENTIAL CLAIM OR SUIT at or before 10 o'clock A.M. of the Monday next after the expiration of 20 days after the date of service hereof before the 96th District Court, 100 N CALHOUN, in and for Tarrant County, Texas, at the Courthouse in the City of Fort Worth, Tarrant County, Texas said PLAINTIFFS being

JUSTIN WILLIAMS, REBEKAH WILLIAMS

Filed in said Court on November 10th, 2022 Against  
CODI VAN DUZEE, CARL LEWIS, JULIE ANDERSON, DR GREG CARTWRIGHT, DR MICHAEL HILL

For suit, said suit being numbered 096-338395-22 the nature of which demand is as shown on said PETITIONER'S VERIFIED PETITION TO TAKE DEPOSITIONS INVESTIGATE A POTENTIAL CLAIM OR SUIT a copy of which accompanies this citation.

GEORGE H SHAKE

Attorney for JUSTIN WILLIAMS Phone No. (214)416-9010

Address 4311 OAK LAWN AVE STE 600 DALLAS, TX 75219

Thomas A. Wilder, Clerk of the District Court of Tarrant County, Texas. Given under my hand and the seal of said Court, at office in the City of Fort Worth, this the 2nd day of December, 2022.

By NyKole Taylor  
NYKOLE TAYLOR



A CERTIFIED COPY  
ATTEST: 12/02/2022  
THOMAS A. WILDER  
DISTRICT CLERK  
TARRANT COUNTY, TEXAS  
BY: /s/ NyKole Taylor

NOTICE: You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10:00 A.M. on the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org.

Thomas A. Wilder, Tarrant County District Clerk, 100 N CALHOUN, FORT WORTH TX 76196-0402

OFFICER'S RETURN \*09633839522000009\*

Received this Citation on the \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_ at \_\_\_\_\_ o'clock \_\_\_\_\_ M; and executed at \_\_\_\_\_ within the county of \_\_\_\_\_, State of \_\_\_\_\_ at \_\_\_\_\_ o'clock \_\_\_\_\_ M on the \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_ by delivering to the within named (Def.): \_\_\_\_\_ defendant(s), a true copy of this Citation together with the accompanying copy of PETITIONER'S VERIFIED PETITION TO TAKE DEPOSITIONS INVESTIGATE A POTENTIAL CLAIM OR SUIT, having first endorsed on same the date of delivery.

Authorized Person/Constable/Sheriff: \_\_\_\_\_

County of \_\_\_\_\_ State of \_\_\_\_\_ By \_\_\_\_\_ Deputy

Fees \$ \_\_\_\_\_

State of \_\_\_\_\_ County of \_\_\_\_\_ (Must be verified if served outside the State of Texas)

Signed and sworn to by the said \_\_\_\_\_ before me this \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_

to certify which witness my hand and seal of office

(Seal)

County of \_\_\_\_\_, State of \_\_\_\_\_

RETURN / AFFIDAVIT  
PROOF / ATTACHED

RETURN / AFFIDAVIT  
PROOF / ATTACHED

**CITATION**

Cause No. 096-338395-22

JUSTIN WILLIAMS, ET AL

VS.

ISSUED

This 2nd day of December, 2022

Thomas A. Wilder  
Tarrant County District Clerk  
100 N CALHOUN  
FORT WORTH TX 76196-0402

By NYKOLE TAYLOR Deputy

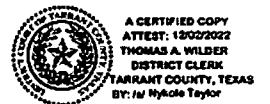
GEORGE H SHAKE  
Attorney for: JUSTIN WILLIAMS  
Phone No. (214)416-9010  
ADDRESS: 4311 OAK LAWN AVE STE 600

DALLAS, TX 75219

**CIVIL LAW**



\*09633839522000009\*  
SERVICE FEES NOT COLLECTED  
BY TARRANT COUNTY DISTRICT CLERK  
ORIGINAL



## PETITION



**NOTICE: THIS DOCUMENT  
CONTAINS SENSITIVE DATA**

096-338395-22

No. \_\_\_\_\_

FILED  
TARRANT COUNTY  
11/10/2022 9:55 AM  
THOMAS A. WILDER  
DISTRICT CLERK

**JUSTIN WILLIAMS AND REBEKAH  
WILLIAMS, A/N/F M.L.W.**

*Petitioners*

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**IN THE DISTRICT COURT**

\_\_\_\_ **JUDICIAL DISTRICT**

**TARRANT COUNTY, TEXAS**

**PETITIONERS' VERIFIED PETITION  
TO TAKE DEPOSITIONS TO INVESTIGATE A POTENTIAL CLAIM OR SUIT**

Petitioners, Justin and Rebekah Williams, as next friend of their minor child, M.L.W. ("Petitioners"), ask the Court for permission to take depositions by oral examination to investigate a potential claim or suit, as allowed by Texas Rule of Civil Procedure 202.

**I. INTRODUCTION**

1. Petitioners are individuals who reside in Tarrant County, Texas. Petitioners are the parents of M.L.W., date of birth, \_\_\_\_\_, a student at Boles Junior High School in Tarrant County, Texas.
2. The following persons are sought to be deposed:

Deponent 1: Codi Van Duzee, Principal, Boles Junior High School, 3900 SW Green Oaks Blvd., Arlington, TX 76017, 682-867-8000.

Deponent 2: Carl Lewis, counselor, Boles Junior High School, 3900 SW Green Oaks Blvd., Arlington, TX 76017, 682-867-8000.

Deponent 3: Julie Anderson, Teacher, Boles Junior High School, 3900 SW Green Oaks Blvd., Arlington, TX 76017, 682-867-8000.

Deponent 4: Dr. Greg Cartwright, Assistant Principal, Martin High School, 4501 W. Pleasant Ridge, Arlington, TX 76016, 682-867-8600.

Deponent 5: Dr. Michael Hill, Assistant Superintendent of Administration, Arlington Independent School District, 690 E. Lamar Blvd., Arlington, TX 76011, 682-867-4611.

## **II. BACKGROUND**

1. On or about August 16, 2022, a minor student (“Perpetrator”) at Boles Junior High School (“School”) and classmate of M.L.W. touched M.L.W.’s buttocks with his foot approximately 20 times during class. Perpetrator did not stop this unwanted contact until another student yelled at him to stop.
2. On or about August 19, 2022, Perpetrator touched M.L.W. with his hand and stated that he was going to rape M.L.W.
3. On or about August 19, 2022, M.L.W.’s mother went to the school and spoke with the school principal, Codi Van Duzee (“Principal”) about the Perpetrator touching M.L.W. with his hand and his threat to M.L.W. that he was going to rape her. The Principal’s response was something to the effect of “This is junior high, they’re going to hear things.” Petitioners had email exchanges with school officials about the Perpetrator and the events surrounding his conduct.
4. On or about August 19, 2022, M.L.W. informed her parents about Perpetrator touching M.L.W.’s buttocks with his foot approximately 20 times during class on or about August 16, 2022.
5. On or about August 19, 2022, Petitioners informed the Principal about Perpetrator touching M.L.W.’s buttocks with his foot approximately 20 times during class on or about August 16, 2022.
6. On or about August 19, 2022, when Petitioners informed the Principal about Perpetrator touching M.L.W.’s buttocks, Principal responded by saying something to the effect of “well we don’t know if that happened. She didn’t tell me or any teachers. Were there any witnesses?”
7. On or about August 22, 2022, an Assistant Principal from Martin High School interviewed witnesses who verified the claim. School did a stay away form – it was written up where it says student told other student that he was going to rape her – written by Dr. Cartwright from Martin

HS. Part of the stay away agreement was Perpetrator would have a schedule change so that he did not have any classes with M.L.W.

8. On or about August 25, 2022, M.L.W. was shocked to see Perpetrator enter her classroom and sit for class. M.L.W. texted her parents who came up to the school immediately to discuss this with a school administrator. While the Petitioners spoke with Principal in a school hallway, Mr. Carl Lewis (“Counselor”) approached the Petitioners and stated that he did not have time to change Perpetrator out of M.L.W.’s class and inform Perpetrator of the schedule change.
9. Petitioners seek to take the deposition of Deponent 1, Deponent 2, Deponent 3, and Deponent 4, Deponent 5, (“Proposed Deponents”) to investigate a potential claim or suit by Petitioners.
10. This petition is filed in Tarrant County, Texas, where Deponents are employed and where all relevant conduct from the Deponents has occurred.
11. The Court has subject-matter jurisdiction over the potential claim or suit if (1) whether any school staff violated the student’s right to a safe environment by allowing the student to be threatened with rape by another student; (2) school staff violated the child’s right to attend school in a safe environment by allowing a student to inappropriately touch her more than once; and/or (3) whether the school staff violated Title IX. The Court has subject-matter jurisdiction over the potential claim or suit, such as a declaratory judgment suit, if any Arlington ISD employees, acting within their scope of employment duties, engaged in discriminatory conduct towards Petitioners’ minor child; such as if any Arlington ISD employees, acting within their scope of employment duties, infringed upon Petitioners’ minor child’s property right to a safe educational environment; such as if any Arlington ISD students engaged in threats of rape/assault against Petitioners’ minor child; such as if any Arlington ISD students engaged in the Intentional Infliction of Emotional Distress against Petitioners’ minor child.
12. The Court has personal jurisdiction over the Deponents. Specifically, the Deponents have

sufficient minimum contacts with Texas for the court to exercise personal jurisdiction over them because they each are employed in Tarrant County, Texas.

### III. REQUEST TO DEPOSE

13. Petitioners ask the Court to issue an order authorizing Petitioners to examine the following persons by oral deposition: Deponent 1, Deponent 2, Deponent 3, Deponent 4, and Deponent 5.
14. Petitioners are not filing suit against these deponents or anyone else.
15. This suit has no respondents.
16. Petitioners are **not** petitioning the Court for an order authorizing the taking of a deposition on oral examination or written questions to perpetuate or obtain the person's own testimony or that of any other person for use in an anticipated suit under Texas Rules of Civil Procedure Rule 202.1(a). Therefore, the Petitioners are **not** required under the rules to identify persons expected to have interests adverse to petitioners, in an anticipated suit under Rule 202.1(f).
17. Petitioners expect to elicit the following testimony from the witnesses: the Deponents are expected to testify about (1) whether any school staff violated the student's right to a safe environment by allowing the student to be threatened with rape by another student; (2) school staff violated the child's right to attend school in a safe environment by allowing a student to inappropriately touch her more than once; and/or (3) whether the school staff violated Title IX.
18. Petitioners need to depose Deponents because they are uniquely positioned to provide information required to determine if a viable claim or suit exists, they may change employment before the claim can be investigated, because records that may currently exist may be destroyed before the claim can be investigated, and because their memories are likely to be fresh at this time but may not be in the future.
19. The **only element** a Rule 202.1(b) petitioner must show is that the likely benefit of allowing the

discovery outweighs the burden or expense of the procedure. *See* Tex. R. Civ. P. Rule 202.4(a)(2); *Glassdoor, Inc. v. Andra Grp., LP*, 560 S.W.3d 281, 298 (Tex. App.—Dallas 2017, pet. granted) (vacated on other grounds); *Breakaway Practice, LLC v. Lowther*, Cause No.5-18-00229-CV, LEXIS 10700, \*6 (Tex. App.—Dallas, December 20, 2018, no pet.)(mem. op.).

20. A merits-based defense to a potential lawsuit is not a valid objection to a petition seeking presuit depositions. *City of Dallas v. City of Corsicana*, 2015 Tex. App. LEXIS 8753, \*11(Tex. App.—Waco August 20, 2015,orig. proceeding) (mem. op.).
21. Rule 202 does not require a potential litigant to expressly state a viable claim before being permitted to take a presuit deposition. *Id. at* \*11-12.
22. The likely benefits to the Petitioners include avoiding the cost of meritless lawsuits, avoiding the continuation of fruitless attempts to obtain the requested information from the requested deponents and others, to efficiently determine if a viable claim(s) and/or suit(s) exist before any statutory or regulatory statute of limitations or deadlines, to pursue justice for Petitioner’s minor child, and to determine if M.L.W. was harmed in any way so that Petitioner can provide M.L.W. with any needed support. The burden to the deponents is none other than the typical burden to all deponents. The deponents will be questioned in a conference room for no more than six hours. The deponents are not required to employ an attorney for their depositions, but they are permitted to do so. Deponents who are employed by school districts will likely have an attorney provided for them by their employer at no cost to the deponents. Deponents who are employed by school districts will likely not have to lose pay to attend their depositions. Deponents will not likely have to travel great distances from their place of employment. Deponents will not be asked about their private relationships or personal finances, unlike many deponents. None of the deponents are employed in the field of national security, the armed forces, first responders, aviation, or medicine which may cause undue burdens.



23. The likely benefit of allowing Petitioners to take the requested depositions to investigate a potential claim outweighs the burden or expense of the procedure.
24. Any involvement of the deponents' employer in this action is strictly voluntary. Therefore, any consideration of alleged burden or expense on their employer is irrelevant. However, out of an abundance of caution, Petitioners posit that any burden or expense on the employer is not significant. Their employer is not a party to this suit. Their employer is not required to provide them legal counsel. Their employer is funded by the federal and state governments. If the employer chooses to provide its employees legal counsel, those costs are de minimis.
25. Petitioners' verification of this pleading is attached hereto as **Exhibit "A"** and incorporated for all purposes.

#### IV. DOCUMENTS

26. Depositions authorized by Rule 202 are governed by the rules applicable to depositions of non-parties in a pending suit. The scope of discovery in depositions authorized by this rule is the *same as if a potential claim had been filed*. Tex. R. Civ. P. Rule 202.5.
27. Depositions of non-parties in a pending suit are governed by Rule 205. Tex. R. Civ. P. Rule 205.
28. A party may compel discovery from a nonparty by serving a subpoena compelling a request for production of documents or tangible things, served with a notice of deposition on oral examination. Tex. R. Civ. P. Rule 205.1(c).
29. The plain language of the rules permits a petition seeking a pre-suit deposition under Rule 202 to request the production of documents as well. *In re Perrilloux*, Cause No. 05-19-01584-CV, Lexis 3737 (Tex. App.—Dallas, May 1, 2020, orig. proc.) (mem. op.) (citing *In re City of Tatum*, 567 S.W.3d 800, 808 (Tex. App.—Tyler 2018, orig. proceeding)) (holding Rule 202 authorizes pre-suit production of documents); see also *Hous. Indep. Sch. Dist. v. Durrell*, 547 S.W.3d 299, 302-03 (Tex. App.—Houston [14th Dist.] 2018, no pet.) (rejecting a plea to the jurisdiction against a

Rule 202 petition seeking both an oral deposition and the production of documents).

30. Petitioner requests that the Court order the Deponents to produce documents at the deposition:

Deponent 1: from the dates August 1, 2022, through November 1, 2022, all documents, forms, notes, calendar entries, letters, emails, text messages, phone records voice messages, recordings of communications, audio recordings, and video recordings regarding M.L.W.

Deponent 2: from the dates August 1, 2022, through November 1, 2022, all documents, forms, notes, calendar entries, letters, emails, text messages, phone records voice messages, and recordings of communications, audio recordings, and video recordings regarding M.L.W.

Deponent 3: from the dates August 1, 2022, through November 1, 2022, all documents, forms, notes, calendar entries, letters, emails, text messages, phone records voice messages, and recordings of communications, audio recordings, and video recordings regarding M.L.W.

Deponent 4: from the dates August 1, 2022, through November 1, 2022, all documents, forms, notes, calendar entries, letters, emails, text messages, phone records voice messages, and recordings of communications, audio recordings, and video recordings regarding M.L.W.

Deponent 5: from the dates August 1, 2022, through November 1, 2022, all documents, forms, notes, calendar entries, letters, emails, text messages, phone records voice messages, and recordings of communications, audio recordings, and video recordings regarding M.L.W.

## **V. ARLINGTON ISD HAS NO STANDING**

31. Arlington ISD is a stranger to this proceeding.

32. Courts are only open to parties who have injuries. Tex. Const. art. 1, § 13.

33. Filing an intervention is the absolute minimal procedural requirement for a third-party seeking relief from a court and it is not waivable. *Diaz v. Attorney Gen. of State*, 827 S.W. 2d 19, 22 (Tex. App.—Corpus Christi 1992, no pet.).

34. Rule 45, Texas Rules of Civil Procedure, requires that pleadings in the district and county courts be by petition and answer. *State v. Scott*, 460 S.W.2d 103, 107 (Tex. 1970); *Dalworth Restoration, Inc. v. Rife-Marshall*, 433 S.W.3d 773, 783 n.1 (Tex. App.—Fort Worth 2014, no pet.).
35. By merely objecting and appearing by counsel at a hearing, parties have not intervened. Rule 60 explicitly requires "filing a pleading" to intervene. TEX. R. CIV. P. 60. *San Juan 1990-A, L.P. v. Meridian Oil*, 951 S.W.2d 159, 164 (Tex. App.—Houston [14th Dist.] 1997, overruled in part on other ground by 109 S.W.3d 750, 755).
36. Arlington ISD is not entitled to any due process in this Rule 202.1(b) proceeding. A Rule 202.1(b) proceeding is a petition to the Court for an order authorizing the taking of a deposition to investigate a potential claim or proceeding. The Texas Rules of Civil Procedure afford third-parties due process only in a Rule 202.1(a) proceeding. A Rule 202.1(a) proceeding is a petition to the Court for an order authorizing the taking of a deposition to perpetuate or obtain the person's own testimony or that of any other person for use in an anticipated proceeding. In a Rule 202.1(a) proceeding a Petitioner is required to identify possible adverse parties, serve the petition and notice of hearing on possible adverse parties. Those requirements do **not** apply to this Rule 202.1(b) proceeding.
37. Arlington ISD is not entitled to move to suppress the requested depositions or attack or oppose the requested depositions. To do so, one must: (1) be an unnamed person described in the petition, (2) whom the petitioner expects to have interests adverse to petitioner's (3) in an anticipated proceeding, if any, and (4) who are served by publication with the petition and notice of the hearing. See Tex. R. Civ. P. § 202.3(b).
38. The Texas Legislature specified what kinds of parties are entitled to due process in Rule 202.1 proceedings. Third parties who have **not** been identified by the Petitioner as unnamed persons in

the petition, in a proceeding to **investigate** a potential claim or proceeding, and who have **not received notice through publication** are not parties entitled to any due process in this proceeding.

39. Additionally, if this Court chooses to treat any pleadings filed on behalf of Arlington ISD as an intervention, Arlington ISD will waive any claimed immunity. *Reata Constr. Corp. v. City of Dallas*, No. 02-1031, 2004 Tex. LEXIS 303 (Tex. Apr. 2, 2004), op. withdrawn, sub. op., 197 S.W.3d 371, 2006 Tex. LEXIS 601 (Tex. 2006) (Tex. 2004, opinion withdrawn by, substituted opinion at 2006 Tex. LEXIS 601, 49 Tex. Sup. Ct. J. 811 (Tex. 2006)).

## V. HEARING

40. After service of this petition and notice, Rule 202.3(a) requires that the Court hold a hearing on the petition. The persons to be deposed must be served at least 15 days before the hearing on the petition. Tex. R. Civ. P. 202.3(a).

## *Prayer*

For these reasons, Petitioners ask the Court to set this petition for hearing and, after the hearing, to order the depositions of Deponent 1, Deponent 2, Deponent 3, Deponent 4, and Deponent 5 and the production of documents and items listed in this petition.

Respectfully submitted,

DUFFEE + EITZEN LLP  
4311 Oak Lawn Avenue, Suite 600  
Dallas, Texas 75219  
Tel: (214) 416-9010  
Fax: (214) 416-9005

By: /s/George Shake  
George H. Shake  
State Bar No. 24077524  
george@d-elaw.com  
Attorney for Petitioners

No. \_\_\_\_\_

JUSTIN WILLIAMS AND REBEKAH  
WILLIAMS, A/N/F M.L.W.

Petitioners

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IN THE DISTRICT COURT

\_\_\_\_ JUDICIAL DISTRICT

TARRANT COUNTY, TEXAS

**PETITIONERS' UNSWORN DECLARATION**

My name is Justin Williams. I am above the age of eighteen years, and I am fully competent to make this declaration. The facts stated in this declaration are within my personal knowledge and are true and correct.

My name is Rebekah Williams. I am above the age of eighteen years, and I am fully competent to make this declaration. The facts stated in this declaration are within my personal knowledge and are true and correct.


"We are the Petitioners in this case.

"We have read the *Petitioners' Verified Petition to Take Depositions to Investigate a Potential Claim or Suit*.

"The facts stated in it are within our personal knowledge and are true and correct."

  
 Justin Williams (Nov 9, 2022 13:57 CST)

Justin Williams


  
 Rebekah Williams (Nov 9, 2022 14:01 CST)

Rebekah Williams



My name is Justin Williams, my date of birth is April 23, 1983, and my address is 5605 Cardinal Oaks Ct., Arlington, Texas, 76017, United States. I declare under penalty of perjury that the foregoing is true and correct.


Executed in Tarrant County, Texas, on Nov 9, 2022.

  
Justin N Williams (Nov 9, 2022 13:57 CST)

Justin Williams, Declarant

My name is Rebekah Williams, my date of birth is July 25, 1986, and my address is 5605 Cardinal Oaks Ct., Arlington, Texas, 76017, United States. I declare under penalty of perjury that the foregoing is true and correct.

Executed in Tarrant County, Texas, on Nov 9, 2022.

  
Rebekah Williams (Nov 9, 2022 14:01 CST)

Rebekah Williams, Declarant

## ORDERS AND NOTICES

096-338395-22

No. 096-338395-22

FILED  
TARRANT COUNTY  
2/27/2023 11:27 AM  
THOMAS A. WILDER  
DISTRICT CLERK

**JUSTIN WILLIAMS AND  
REBEKAH WILLIAMS, A/N/F M.L.W.**

*Petitioners*

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**IN THE DISTRICT COURT**

**96<sup>TH</sup> JUDICIAL DISTRICT**

**TARRANT COUNTY, TEXAS**

**NOTICE OF COURT PROCEEDING**

You are hereby notified that a hearing on Justin and Rebekah Williams' *Petitioners' Verified Petition to Take Depositions to Investigate a Potential Claim or Suit* filed on November 10, 2022, in the above-styled and numbered cause of action is set on the Court's docket for an in person hearing on April 7, 2023 at 10:00 a.m. in the 96<sup>th</sup> Judicial District Court, located at 100 North Calhoun Street, Fort Worth, Texas 76196.

The purpose of this hearing is to determine whether the relief requested in the *Petitioners' Verified Petition to Take Depositions to Investigate a Potential Claim or Suit* should be granted.

The contact information for the court is:

100 North Calhoun Street  
Fort Worth, Texas 76196  
817-884-2685

**YOU MUST PARTICIPATE IN THE HEARING BY APPEARING IN-PERSON AT  
THE COURTHOUSE.**

**TO APPEAR IN PERSON:** At the designated time above, report in-person at the above location.

If you plan to introduce documents and evidence during the hearing, you must be prepared to share them by producing one copy each to the Judge, Opposing Counsel, and Witness.

/s/George Shake

George H. Shake  
State Bar No. 24077524  
george@D-Elaw.com  
Attorney for Justin and Rebekah Williams

**Automated Certificate of eService**

This automated certificate of service was created by the eFiling system. The filer served this document via email generated by the eFiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Lindy McMahan on behalf of George Shake  
Bar No. 24077524  
lindy@d-elaw.com  
Envelope ID: 73133872  
Status as of 2/27/2023 11:32 AM CST

Associated Case Party: JUSTINWILLIAMS

Name	BarNumber	Email	TimestampSubmitted	Status
George Shake		george@d-elaw.com	2/27/2023 11:27:39 AM	SENT

## DOCKET SHEET

TO ORDER COPIES OF ANY DOCUMENTS LISTED  
BELOW, CALL WESTLAW COURTEXPRESS  
1-877-DOC-RETR (1-877-362-7387) (Additional Charges Apply)

**This docket is current through 03/21/2023**

Today's Date: 3/21/2023

Source: 096Th District Court, Tarrant COUNTY, TEXAS

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#### CASE INFORMATION

Case Title:	<a href="#">In Re: Justin Williams, Et Al</a>
Court:	096Th District Court, Tarrant COUNTY
Case Number:	096-338395-22
Case Type:	Civil
Case Subtype:	Other Civil, Other
Date Filed:	11/10/2022
Case Status:	Pending

#### PARTICIPANT INFORMATION

**Justin Williams**

Party Number:	1
Type:	Petitioner
Status:	Active
Address:	TX
Attorney:	George H Shake
Attorney Status:	Active (Lead Attorney)
Attorney Phone:	214-416-9010
Bar Number:	24077524
Email Address:	GEORGE@D-ELAW.COM
Firm Name:	Duffee + Eitzen LLP
Firm Address:	4311 Oak Lawn Ave Ste 600 Dallas, TX 75219
Firm Phone:	214-416-9010
Firm Fax:	214-416-9005

**Rebekah Williams**

Party Number:	2
Type:	Petitioner

**EXHIBIT**

**4** <sup>1</sup>



**Status:** Active  
**Address:** TX  
**Attorney:** George H Shake  
**Attorney Status:** Active (Lead Attorney)  
**Attorney Phone:** 214-416-9010  
**Bar Number:** 24077524  
**Email Address:** GEORGE@D-ELAW.COM  
**Firm Name:** Duffee + Eitzen LLP  
**Firm Address:** 4311 Oak Lawn Ave Ste 600  
Dallas, TX 75219  
**Firm Phone:** 214-416-9010  
**Firm Fax:** 214-416-9005

## Minor Child

**Party Number:** 3  
**Type:** Minor Child  
**Status:** Active  
**Other Info Related to this Party:** Party Relationship: Williams, Rebekah

## Codi Van Duzee

**Party Number:** 4  
**Type:** Deponent R202  
**Status:** Active  
**Address:** 3900 Sw Green Oaks Blvd  
Arlington, TX 76017  
**Phone:** 682-867-8000

## Carl Lewis

**Party Number:** 5  
**Type:** Deponent R202  
**Status:** Active  
**Address:** 3900 Sw Green Oaks Blvd  
Arlington, TX 76017  
**Phone:** 682-867-8000

## Julie Anderson

**Party Number:** 6  
**Type:** Deponent R202  
**Status:** Active  
**Address:** 3900 Sw Green Oaks Blvd  
Arlington, TX 76017  
**Phone:** 682-867-8000

**Dr. Greg Cartwright**

**Party Number:** 7  
**Type:** Deponent R202  
**Status:** Active  
**Address:** 4501 W Pleasant Ridge  
Arlington, TX 76016  
**Phone:** 682-867-8600

**Dr. Michael Hill**

**Party Number:** 8  
**Type:** Deponent R202  
**Status:** Active  
**Address:** 690 E Lamar Blvd  
Arlington, TX 76011  
**Phone:** 682-867-4611

**DOCKET PROCEEDINGS (25)**

Date:	Entry #:	Description:	Date Docketed:	Party:
03/08/2023		<b>Docket Entry:</b> Cit Tr# 9 Ret Exec(Dr Michael Hill) On 03/03/2023		<a href="#">View</a> <a href="#">Add to request</a>
03/08/2023		<b>Docket Entry:</b> Rtn Of Svc-Dr Michael Hill		<a href="#">View</a> <a href="#">Add to request</a>
03/03/2023		<b>Docket Entry:</b> Cit Tr# 5 Ret Exec(Codi Van Duzee) On 03/02/2023		<a href="#">View</a> <a href="#">Add to request</a>
03/03/2023		<b>Docket Entry:</b> Cit Tr# 6 Ret Exec(Carl Lewis) On 03/02/2023		<a href="#">View</a> <a href="#">Add to request</a>
03/03/2023		<b>Docket Entry:</b> Cit Tr# 7 Ret Exec(Julie Anderson) On 03/02/2023		<a href="#">View</a> <a href="#">Add to request</a>
03/03/2023		<b>Docket Entry:</b> Cit Tr# 8 Ret Exec(Dr Greg Cartwright) On 03/02/2023		<a href="#">View</a> <a href="#">Add to request</a>
03/03/2023		<b>Docket Entry:</b> Rtn Of Svc-Carl Lewis		<a href="#">View</a> <a href="#">Add to request</a>
03/03/2023		<b>Docket Entry:</b> Rtn Of Svc-Codi Van Duzee		<a href="#">View</a> <a href="#">Add to request</a>
03/03/2023		<b>Docket Entry:</b> Rtn Of Svc-Dr Greg Cartwright		<a href="#">View</a> <a href="#">Add to request</a>
03/03/2023		<b>Docket Entry:</b> Rtn Of Svc-Julie Anderson		<a href="#">View</a> <a href="#">Add to request</a>
02/27/2023		<b>Docket Entry:</b> Not Of Court Proceeding 4/7/23 10am-Ptnrs' Verified Pet To Take Depos To Investigate A Potential Clm Or Suit		<a href="#">View</a> <a href="#">Add to request</a>
12/01/2022		<b>Docket Entry:</b> Atty Ltr Req Cits Emailed (Fwd Doc Prod/Aw)		<a href="#">View</a> <a href="#">Add to request</a>

12/01/2022	<b>Docket Entry:</b> Cit-Issued On Carl Lewis-On 12/02/2022 <b>Amount/Fee:</b> Assessed Fee: \$8.00	<a href="#">Send Runner to Court</a>
12/01/2022	<b>Docket Entry:</b> Cit-Issued On Codi Van Duzee-On 12/02/2022 <b>Amount/Fee:</b> Assessed Fee: \$8.00	<a href="#">Send Runner to Court</a>
12/01/2022	<b>Docket Entry:</b> Cit-Issued On Dr Greg Cartwright-On 12/02/2022 <b>Amount/Fee:</b> Assessed Fee: \$8.00	<a href="#">Send Runner to Court</a>
12/01/2022	<b>Docket Entry:</b> Cit-Issued On Dr Michael Hill-On 12/02/2022 <b>Amount/Fee:</b> Assessed Fee: \$8.00	<a href="#">Send Runner to Court</a>
12/01/2022	<b>Docket Entry:</b> Cit-Issued On Julie Anderson-On 12/02/2022 <b>Amount/Fee:</b> Assessed Fee: \$8.00	<a href="#">Send Runner to Court</a>
12/01/2022	<b>Docket Entry:</b> Payment Received Trans # 5 <b>Amount/</b> <b>Fee:</b> Credit/Paid Fee: \$8.00	<a href="#">Send Runner to Court</a>
12/01/2022	<b>Docket Entry:</b> Payment Received Trans # 6 <b>Amount/</b> <b>Fee:</b> Credit/Paid Fee: \$8.00	<a href="#">Send Runner to Court</a>
12/01/2022	<b>Docket Entry:</b> Payment Received Trans # 7 <b>Amount/</b> <b>Fee:</b> Credit/Paid Fee: \$8.00	<a href="#">Send Runner to Court</a>
12/01/2022	<b>Docket Entry:</b> Payment Received Trans # 8 <b>Amount/</b> <b>Fee:</b> Credit/Paid Fee: \$8.00	<a href="#">Send Runner to Court</a>
12/01/2022	<b>Docket Entry:</b> Payment Received Trans # 9 <b>Amount/</b> <b>Fee:</b> Credit/Paid Fee: \$8.00	<a href="#">Send Runner to Court</a>
11/10/2022	<b>Docket Entry:</b> Payment Paid To State Trans # 1 <b>Amount/</b> <b>Fee:</b> Credit/Paid Fee: \$137.00	<a href="#">Send Runner to Court</a>
11/10/2022	<b>Docket Entry:</b> Payment Received Trans # 1 <b>Amount/</b> <b>Fee:</b> Credit/Paid Fee: \$213.00	<a href="#">Send Runner to Court</a>
11/10/2022	<b>Docket Entry:</b> Ptnrs' Verified Pet To Take Depos To Investigate Apotential Claim Or Suit <b>Amount/Fee:</b> Assessed Fee: \$350.00	<a href="#">View</a> <a href="#">Add to request</a>

TO ORDER COPIES OF ANY DOCUMENTS LISTED  
ABOVE, CALL WESTLAW COURTEXPRESS  
1-877-DOC-RETR (1-877-362-7387) (Additional Charges Apply)